

Richard Garren

From: Richard Garren
Sent: Friday, January 11, 2008 8:21 AM
To: John Tucker; 'Isutherland@rhodesokla.com'
Cc: Bob Nance; LBULLOCK@bullock-blakemore.com; David Riggs; 'Baker, Fred'; Kelly.Burch@oag.ok.gov
Subject: 30(b)(6) Deposition rescheduling.

John & Leslie,

You have indicated all defendants are wanting to defer the 30b6 noticed deposition of the State's witnesses until some date after the Preliminary Injunction hearing and you requested in turn, that the State defer the Cargill 30b6 depositions. As we discussed previously the state is willing to work with defendants to reset the state's witness depositions however the Cargill depositions need to occur. You then requested and I agreed to look at modifying the notice to Cargill to save some time. I have done that and would agree to amend the notices to Cargill Inc. and Cargill Turkey Production as set forth below.

Here is my amended 30b6 notice list by inquiry number for each entity. The number listed is the category of inquiry for the deposition currently scheduled. I anticipate this could be done in a single day rather than two.

Again areas of inquiry for the modified Cargill depositions are listed by reference to original exhibit notice.

Cargill Inc:
Inquiry # 1, 2, 25, 27, & 31.

Cargill Turkey Production:
Inquiry # 1-6, 9, 10,11, 17, 18, 23, 24, 26, 28-31.

Please confirm whether defendants agree to the modifications set forth herein. Due to obvious time constraints this offer will expire Monday the 14th at close of business.

Richard T. Garren, Esq.
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